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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION, SOUTHERN REGION**

BLUERIBBON COALITION, INC.,

Plaintiff,

v.

BUREAU OF LAND MANAGEMENT,
et al.,

Defendants,

and

SOUTHERN UTAH WILDERNESS
ALLIANCE,

Intervenor-Defendant.

Case No. 4:25-cv-00044-AMA-PK

**UNOPPOSED MOTION
TO STAY PROCEEDINGS**

Judge Ann Marie McIff Allen
Magistrate Judge Paul Kohler

Defendants, the United States Department of the Interior and its Bureau of Land Management (“BLM”), move to stay proceedings in this litigation for 90 days so that incoming BLM leadership has an opportunity to reassess the agency action challenged in this case. Plaintiff, BlueRibbon Coalition Inc., is not opposed to this motion, and Intervenor-Defendant, the Southern Utah Wilderness Alliance, takes no position on the motion.

This case challenges the BLM Henry Mountains and Fremont Gorge Travel Management Plan (“TMP”), which makes designations relating to the use of off-highway vehicles on BLM-managed public lands. The TMP is one of a series of actions spanning six Utah BLM field offices relating to a dispute arising in 2008. *See BlueRibbon Coal. v. Bureau of Land Mgmt.*, No. 2:23-cv-923-DAK-JCB, 2024 WL 1197862, at *1 (D. Utah March 20, 2024). The underlying dispute was resolved “through a settlement agreement that this court approved, and the Tenth Circuit affirmed.” *Id.* The TMP reflects BLM’s ongoing effort to address the framework and schedule for issuance of travel plans set forth by the settlement agreement. Travel plans adopted to-date under the settlement agreement have given rise to a new round of litigation, and this marks the fourth such TMP-related dispute now pending in this District. The other cases include the aforementioned Case No. 23-cv-923-DAK-JCB (Labyrinth/Gemini Bridges TMP), Case No. 25-cv-22-DN (San Rafael Swell TMP), and Case No. 2:24-cv-172-TS-DAO (San Rafael Desert TMP).

Officials at the Department of the Interior are reviewing the respective travel plans and considering BLM’s broader framework for travel management. Accordingly, BLM wants to slow this litigation in its formative stages so that it can further evaluate how it wants to proceed, if appropriate, in a manner that could affect the TMP or the issues in this litigation. A stay would “allow BLM [and its incoming leadership] time to assess its position with respect to

defending the travel management plan.” Mem. Decision and Order 2, ECF No. 91 in Case No. 23-cv-923-DAK-JCB (May 13, 2025).

A stay would also promote judicial economy. *Id.*; see also *Am. Petroleum Inst. v. EPA*, 683 F.3d 382, 386 (D.C. Cir. 2012) (“Postponing review can also conserve judicial resources, and it comports with our theoretical role as the governmental branch of last resort.”). And a stay would streamline docket management by allowing similar, prior-filed cases to set the pace for this case. In the San Rafael Desert TMP, the court granted BLM’s motion to extend its response deadline for merits briefing by 90-days, to July 28, 2025. *See* Fourth Am. Scheduling Order, ECF No. 48 in Case 2:24-cv-172-TS-DAO. The parties in the San Rafael Swell TMP case have submitted a proposed scheduling order setting the deadline to produce the Administrative Record for September 12, 2025. *See* Joint Mot. for Administrative Appeal Scheduling Order, ECF No. 30 in Case No. 25-cv-22-DN (May 28, 2025). Staying this case prior to the answer deadline, and before either the Court or the parties invest more resources in its adjudication, is well warranted from a judicial economy standpoint.

In order to promote judicial economy and provide BLM and its incoming leadership with time to assess its positions with respect to the Henry Mountains and Fremont Gorge TMP, BLM respectfully requests a 90-day stay of this case. Counsel will continue to confer and advise before expiration of the requested stay whether or how this litigation should proceed.

A proposed order follows this brief.

Respectfully submitted this 17th day of June 2025.

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/s/ Erik Van de Stouwe

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